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Arizona Corporation Commission

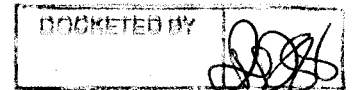
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JUL 29 2011

July 29, 2011

AZ CORP COMMISSION
DOCKET CONTROL

Mr. Steve Olea
Director - Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007



RE: DOCKET NO. T-00000A-97-0238
QWEST CORPORATION'S QUARTERLY REPORT ON RESOLD LINE SPLITTING
AND EEL

Dear Steve,

In Decision No. 64880 dated June 5, 2002, the Commission ordered Qwest to file quarterly reports concerning the demand for resold line sharing and EEL line sharing in legacy Qwest's 14 state region.

On September 30, 2002, Qwest filed its first quarterly report in compliance with the Commissions order. For your reference, I have attached a copy of Qwest's 2nd Quarter 2011 report which is being docketed today. During the eight and one-half years since that first report was filed, Qwest has filed 34 subsequent quarterly reports which have all reflected that no orders have been received for either product in any Qwest state. Further, no CLEC has come forward to dispute Qwest's 35 previous filings reporting that there have not been any requests for these services.

The intended purpose of the report was to provide Staff and CLECs with information "so that interested parties can make an independent determination of when demand justifies the making these products standard offerings." Since no provider has demonstrated a need for these services at any time during the past 8 years, Qwest believes that it is doubtful that demand will ever develop.

At this time Qwest believes that an indefinite suspension of this reporting requirement is warranted. The report serves no useful purpose as long as there is no demand for resold line splitting or EEL line splitting. Given the amount of time that has passed since the Commission issued its order on resold line splitting and EEL line splitting, as well as the relatively matured state of competition in Arizona, Qwest questions whether the report would provide any useful purpose even if demand were to develop for these products at some future point in time. However, Qwest will continue to monitor these services in the future and in the unlikely event that it receives orders for either service, it will resume reporting at that point in time. We believe that this approach will help avoid the wasteful use of resources for all parties, including Qwest,

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the Commission, and CLECs, but will still comply with the stated intent of the Commission's decision.

A copy of this letter is being filed with Docket Control and is being sent to each remaining party on the service list for Docket No. T-00000A-97-0238.

Please let me know if you have any questions or wish to discuss.

Sincerely,

A handwritten signature in cursive script, appearing to read "Reed Peterson".

Attachment

cc: Docket Control
Brian Bozzo